



RUTHERFORD & CHRISTIE LLP
NEW YORK ATLANTA

August 10, 2015

VIA ECF

The Honorable Ramon E. Reyes, Jr.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *G.S., Plaintiff v. Congregation Lev Bais Yaakov, et al.*
Docket No.: 15 CV 3086 (ARR) (RER), Our File No.: 215.472

Dear Judge Reyes:

As you are aware, we represent the Defendants Congregation Lev Bais Yaakov, Rivka Oratz, and Schmeil Deutsch (“Defendants”) in this matter. This letter is in response to the plaintiff’s letter of August 4, 2015 regarding a proposed confidentiality order.

Following review of Mr. Tolchen’s proposed order, we find it acceptable. However, paragraph 6 refers to an annexed non-disclosure agreement that is not included in Mr. Tolchen’s filing. We have therefore annexed to this letter a proposed Non-Disclosure Agreement.

Respectfully Submitted,

RUTHERFORD & CHRISTIE, LLP

Adam C. Guzik

Encl.

cc: **VIA ECF**

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EXHIBIT A

The undersigned hereby acknowledges that he/she has read the Stipulation and Protective Order entered in the United States District Court for the Eastern District of New York on _____, 201____ in the action entitled G.S. by her father and natural guardian Morris S., v. Congregation Yeshiva Bais Yaakov, et al., Docket No. 15 CV 3086 (AAR)(RER), and understands the terms thereof. The undersigned agrees not to use or disclose the Confidential Materials defined therein for any purposes other than in connection with the litigation of this case.

Date

Signature

Print Name

Occupation